

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**United States of America**

**v.**

**Nader Joseph**

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**No. 1:20-cr-99-LM-01**

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**  
[26 U.S.C. § 7206(1)]

On or about June 9, 2015, in the District of New Hampshire,

**Nader Joseph,**

did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for the tax year 2014, verified by a written declaration that it was made under the penalties of perjury, and filed with the Director, Internal Revenue Service, which he did not believe to be true and correct as to every material matter. That Form 1040 failed and omitted to attach a Schedule C reporting any income, expenses, and net profit or loss from his unlicensed used car business, whereas, as **Joseph** then and there knew, he had that year received income, incurred expenses, and generated a net profit from that business.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT TWO  
[26 U.S.C. § 7206(1)]

On or about June 28, 2016, in the District of New Hampshire,

**Nader Joseph,**

did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, for the tax year 2015, verified by a written declaration that it was made under the penalties of perjury, and filed with the Director, Internal Revenue Service, which he did not believe to be true and correct as to every material matter. That Form 1040 failed and omitted to attach a Schedule C reporting any income, expenses, and net profit or loss from his unlicensed used car business, whereas, as **Joseph** then and there knew, he had that year received income, incurred expenses, and generated a net profit from that business.

All in violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL

/s/ Foreperson  
Grand Jury Foreperson

SCOTT W. MURRAY  
United States Attorney

/s/ Anna Dronzek  
Anna Dronzek  
Assistant United States Attorney

Date: September 21, 2020